

Respectfully submitted,

Dated: April 2, 2024

GOLDBERG SEGALLA LLP

/s/ Michael P. Luongo

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Attorneys for Defendants

Marsh USA, LLC and Therese Perrette

CERTIFICATE OF NON-CONCURRENCE

I, Michael P. Luongo, Esq., hereby certify that I contacted counsel for Plaintiff regarding possible concurrence with Defendants' Motion to Bifurcate Trial Into Separate Liability and Damages Phases and that Plaintiff's counsel did not concur with Defendants' Motion.

s/ Michael Luongo
Michael P. Luongo, Esq.

Dated: April 2, 2024

CERTIFICATE OF SERVICE

I, Michael P. Luongo, Esq., hereby certify that a true and correct copy of the forgoing Motion to Bifurcate Trial into Separate Liability and Damages Phases was served on all counsel of record via ECF on the date below.

s/ Michael Luongo
Michael P. Luongo, Esq.

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